

EXHIBIT F

1 HIGHLY CONFIDENTIAL PURSUANT TO PO
2 UNITED STATES DISTRICT COURT
3 NORTHERN DISTRICT OF CALIFORNIA
4 SAN FRANCISCO DIVISION
5 CASE NO. 3:23-cv-03417-VC

6 RICHARD KADREY, et al., :
7 Individual and Representative :
8 Plaintiff, :

9 v. :

10 META PLATFORMS, INC., a Delaware :
11 Corporation, :
12 Defendant. :

13 ----- x

14 VIDEOTAPE DEPOSITION OF:
15 TA-NESHI COATES
16 NEW YORK, NEW YORK
17 THURSDAY, NOVEMBER 21, 2024

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23
24 REPORTED BY:
25 SILVIA P. WAGE, CCR, CRR, RPR
JOB NO. 6985779

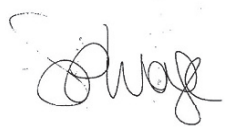
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1 HIGHLY CONFIDENTIAL PURSUANT TO PO
2 Meta's Large Language Model, you lost a 11:42:59
3 particular licensing deal? 11:43:02
4 A. No. 11:43:03
5 Q. Have Meta's Large Language 11:43:09
6 Models caused you, Mr. Coates, to not want 11:43:13
7 to continue writing books? 11:43:15
8 A. No. 11:43:17
9 MR. RATHUR: Objection to 11:43:18
10 form. 11:43:19
11 Go ahead. 11:43:19
12 A. No. 11:43:20
13 Q. Are you aware of any documents 11:43:22
14 that support -- strike that. 11:43:28
15 Are you aware of any documents that 11:43:33
16 show that you have lost sales of your 11:43:36
17 books due to Meta's training of its Large 11:43:40
18 Language Models? 11:43:46
19 A. No. 11:43:46
20 Q. Are you aware of any documents 11:43:50
21 showing that you lost a specific licensing 11:43:53
22 opportunity for one of your three books 11:43:57
23 because of Meta's training of its Large 11:44:01
24 Language Models? 11:44:04
25 A. No. 11:44:04

HIGHLY CONFIDENTIAL PURSUANT TO PO
CERTIFICATE OF REPORTER

I, SILVIA P. WAGE, CSR, CRR, RPR,
herby certify that the witness in the
foregoing deposition was by me duly sworn
to tell the whole truth, nothing but the
truth; said deposition was taken down in
shorthand by me, a disinterested person,
at the time and place therein stated. The
testimony of said witness was thereafter
reduced to typewriting by computer under
my direction and supervision. Before
completion of the deposition, review of
the transcript [X] was [] was not
requested. If requested, any changes
made by the deponent (and provided to
the reporter) during the period allowed
are appended hereto.

I further certify that I am not of
counsel or attorney for either or any
of the parties to the said deposition,
nor in any way interested in the event
of this cause, and that I am not
related to any of the parties thereto.

SIGNED: 
dated: December 5, 2024

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)
)
Individual and)
Representative Plaintiffs,)
)
vs.) Case No.
) 3:23-cv-03417-VC
META PLATFORMS, INC., a)
Delaware corporation,)
)
Defendant.)
-----)

VIDEO-RECORDED DEPOSITION OF ANDREW SEAN GREER

Tuesday, September 24, 2024

San Francisco, California

Stenographically Reported By:
Hanna Kim, CLR, CSR No. 13083
Job No. 6928896

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1 A. No.

2 Q. Why not?

3 MR. CLOBES: Objection to form.

4 THE WITNESS: Because it seems important.

5 BY MR. LAUTER: 11:05:32

6 Q. Why does it seem important?

7 A. Because being a writer is really
8 difficult. It involves a huge amount of life
9 sacrifice. And the value of it is getting to make
10 something that has never before existed in the world 11:05:56
11 and to put your name on it and to know that no one
12 but you could have made it. And I've spent my life
13 on that path. And to see that someone would take
14 from me the one value, the -- possibly the purpose
15 of my life, it seemed important to take a stand 11:06:16
16 against that, not just for me, but for all the other
17 artists who have made those sacrifices and have
18 created those things that no one else could have
19 created.

20 Q. And is it your position that Meta is 11:06:32
21 preventing you from creating books?

22 A. My position is that Meta did not contact
23 me or get permission or give credit or compensation
24 for my copyrighted books that they used in their
25 entirety to train their large language model. 11:06:55

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1 Q. But Meta hasn't stopped you from writing
2 books?

3 A. No.

4 Q. And Meta hasn't stopped other people from
5 reading your books?

11:07:05

6 MR. CLOBES: Objection to form.

7 THE WITNESS: I have not thought about
8 that, but that doesn't seem to be what we're talking
9 about today.

10 BY MR. LAUTER:

11:07:15

11 Q. Okay. To your knowledge, has Meta stopped
12 others from reading your books?

13 A. No.

14 Q. I'm going to hand you a document to be
15 marked as Exhibit 181.

11:07:30

16 (Greer Deposition Exhibit 181 was marked
17 for identification.)

18 BY MR. LAUTER:

19 Q. Earlier you said that it seemed important
20 to you to bring this case because Meta had taken
21 from you the one value, possibly the purpose of your
22 life. Is that a fair characterization?

11:08:33

23 A. Yes.

24 MR. CLOBES: Objection to form.

25 THE WITNESS: Sorry. I keep not pausing.

11:08:49

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CERTIFICATE OF REPORTER

I, Hanna Kim, a Certified Shorthand Reporter, do hereby certify:

That prior to being examined, the witness in the foregoing proceedings was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;

That said proceedings were taken before me at the time and place therein set forth and were taken down by me in shorthand and thereafter transcribed into typewriting under my direction and supervision;

I further certify that I am neither counsel for, nor related to, any party to said proceedings, not in anywise interested in the outcome thereof.

Further, that if the foregoing pertains to the original transcript of a deposition in a federal case, before completion of the proceedings, review of the transcript [X] was [] was not requested.

In witness whereof, I have hereunto subscribed my name.

Dated: 10/1/24



Hanna Kim

CLR, CSR No. 13083

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION
RICHARD KADREY, ET AL)
Plaintiffs) Case No.: 3:23-cv-03417-VC
Vs.)
META PLATFORMS, INC.,)
A Delaware Corporation)
Defendant)

Deposition of LAURA LIPPMAN, was taken
via videotape on Tuesday, September 17, 2024,
commencing at 9:32 a.m., at Kramon & Graham, P.A.,
750 East Pratt Street, Suite 1100, Baltimore,
Maryland, before MICHELE D. LAMBIE, Notary Public.

Reported By:
Michele D. Lambie, CSR-RPR

1 to form. 03:18:41

2 THE WITNESS: The fact of the matter is 03:18:41

3 I'm pretty sui generis, which is not necessarily 03:18:48

4 the best thing commercially, but the only 03:18:56

5 comparisons that I've heard that makes sense to me 03:19:02

6 are with the writer Megan Abbott, who's a good 03:19:07

7 friend, and the writer Kate Atkinson, who's one of 03:19:14

8 the best, and happened to be two women with whom I 03:19:17

9 tied for prizes with. 03:19:21

10 BY MS. DUNNING: 03:19:24

11 Q. Do their books inspire you as a writer? 03:19:24

12 MR. SWEATMAN: Objection to form. 03:19:33

13 THE WITNESS: Everything inspires me as a 03:19:33

14 writer. 03:19:41

15 BY MS. DUNNING: 03:19:43

16 Q. Okay. Do you plan to keep writing books? 03:19:43

17 A. I do. 03:19:52

18 Q. Do you have any books memorized? 03:19:52

19 MR. SWEATMAN: Objection. Form. 03:20:10

20 THE WITNESS: I can't -- I'll tell you 03:20:12

21 that I can't even memorize a poem. My memory just 03:20:19

1 State of Maryland

2 County of Baltimore, to wit:

3 I, Michele D. Lambie, a Notary Public of
4 the State of Maryland, County of Baltimore, do
5 hereby certify that the within-named witness
6 personally appeared before me at the time and place
7 herein set out, and after having been duly sworn by
8 me, according to law, was examined by counsel.

9 I further certify that the examination
10 was recorded stenographically by me and this
11 transcript is a true record of the proceedings.

12 I further certify that I am not of
13 counsel to any of the parties, nor related to any
14 of the parties, nor in any way interested in the
15 outcome of this action.

16 As witness my hand and notarial seal this
17 2nd day of October 2024.

18
19 
20
21

CONFIDENTIAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

- - - - -
RICHARD KADREY, et al, |
Plaintiffs, | Case Number:
vs. | 3:23-cv-03417-VC
META PLATFORMS, INC., a |
Delaware corporation, |
Defendant. |
- - - - -

Confidential Videotaped Deposition of
RACHEL LOUISE SNYDER
Wednesday, December 11, 2024
at 9:42 a.m.
in Washington, D.C.

Reported by:
Laurie Donovan, RPR, CRR, CLR
JOB 7030288

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CONFIDENTIAL

1 A Yes. I think that's very true. I mean I
2 think, I think the billionaires of the world are
3 trying to dispose with regulatory measures for that
4 very reason, yes. I mean science fiction has power
5 because it is so predictive.

6 Q Do you intend to keep writing?

7 A Do I intend to keep writing? I'm sorry. It
8 just sounded so insulting the way you put that.

9 Q I'm sorry. I certainly didn't mean that. I
10 don't know why you thought that, but I'll try to ask
11 it a different way.

12 A Yeah.

13 Q I'm really asking -- I mean your intention
14 is to keep being a writer, right?

15 A Is your intention to keep being an attorney?
16 Yes. Like yes. That's what I do as a profession,
17 yes, but I don't know that I -- I don't know that it's
18 going to be a scenario in which one can make a living
19 in years to come.

20 Q No matter what AI is generating, do you
21 believe you have something to offer in terms of your
22 insight, your experience, your skill as a writer?

23 A It's not what I believe; it's what the world
24 sees as valuable and worth purchasing, and that's the
25 piece of it that I'm worried about. Will I continue

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CERTIFICATE OF SHORTHAND REPORTER -- NOTARY PUBLIC

I, Laurie Donovan, Registered Professional Reporter, Certified Realtime Reporter, and notary public for the District of Columbia, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 24th day of December 2024.

My commission expires: July 14, 2027

A handwritten signature in purple ink, reading "Laurie Donovan", is written over a horizontal line.

LAURIE DONOVAN

NOTARY PUBLIC IN AND FOR
THE DISTRICT OF COLUMBIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-----x

RICHARD KADREY, et al.,
Individual and Representative,
Plaintiffs, Case No.
v. 3:23-cv-03417-VC
META PLATFORMS, INC., a
Delaware Corporation;
Defendant.

-----x

VIDEOTAPED DEPOSITION of JACQUELINE A.
WOODSON, held at 55 Hudson Yards, New
York, New York, commencing at 9:39 a.m.,
September 30, 2024, before Erica Ruggieri,
a Certified Shorthand Reporter and Notary
Public of the State of New York.

JOB No. 6931571

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WOODSON

A. Yes.

Q. You'd agree with me that there can be multiple different works about the same basic story line?

MR. SWEATMAN: Objection, form.

Q. It can all be entitled to their own copyright?

MR. SWEATMAN: Objection to form.

A. If you are saying, for example, multiple stories about love, yes.

Q. Star crossed lovers for instance, everyone is free to write a story about star crossed lovers, right?

MR. SWEATMAN: Objection to form.

A. Yes.

Q. Is it your plan to keep writing books?

A. Yes.

WOODSON

Q. Why is that?

A. I love writing.

Q. Do you have any books or --
let me back up.

Do you have any works
memorized?

A. Yes.

Q. You have poems memorized?

A. Yes.

Q. Song lyrics memorized?

A. Yes.

Q. Do you have any books
memorized?

A. Of my own, yes.

Q. You are a mom. Could you
recite a good chunk of Goodnight
Moon if asked to?

A. No.

Q. What about The Very Hungry
Caterpillar?

A. No.

Q. You would agree with me you
could have a work memorized because
you know it well but not have that

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REPORTER'S CERTIFICATE

I, ERICA L. RUGGIERI, RPR and a
Notary Public within and for the State
of New York, do hereby certify:

That I reported the proceedings
in the within-entitled matter, and
that the within transcript is a true
record of such proceedings.

I further certify that I am not
related by blood or marriage, to any
of the parties in this matter and
that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have
hereunto set my hand this 20th day of
October, 2024.

A handwritten signature in black ink that reads "Erica Ruggieri". The signature is written in a cursive, flowing style.

ERICA L. RUGGIERI, RPR, CSR, CLR